

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of	)	
	)	
Request for Waiver and Applications for	)	WT Docket No. 12-373
Assignment of the Upper 700 MHz C Block	)	
License in the Gulf of Mexico From	)	
Small Ventures USA, LLP to Cellco Partnership	)	
d/b/a Verizon Wireless	)	

To: Chief, Wireless Telecommunications Bureau

**RESPONSE OF VERIZON WIRELESS**

Cellco Partnership d/b/a/ Verizon Wireless (“Verizon Wireless”) hereby submits this response to clarify its plans in the Gulf of Mexico. On January 22, 2012, The American Petroleum Institute (“API”) submitted comments seeking a clarification in response to the Federal Communications Commission’s (“Commission”) Public Notice<sup>1</sup> regarding the Request for Waiver and Applications for Assignment of the Upper 700 MHz C Block License in the Gulf of Mexico to Verizon Wireless. While API does not object to the Applicants’ request for waiver, it does ask that the Commission clarify the proposed construction obligation in any Order granting the Applications.<sup>2</sup>

Specifically, API requests that the Commission more precisely define the types of offshore structures that Verizon Wireless will be able to consider as a proxy for population to meet its build-out obligations in the Shoreside Partition (the spectrum covering the portion of the Gulf closest to the shoreline as defined in Schedule G of the relevant Form 603). API asks the

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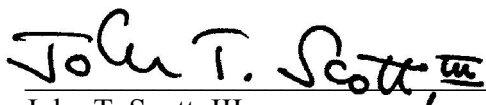
<sup>1</sup> See Wireless Telecommunications Bureau Seeks Comment on Request for Waiver and Applications for Assignment of the Upper 700 MHz C Block License in the Gulf of Mexico from Small Ventures USA, LP to Cellco Partnership d/b/a/ Verizon Wireless, *Public Notice*, WT Docket No. 12-373, DA 12-2066 (2012).

<sup>2</sup> API Comments at 1.

Commission to include not just “drilling platforms” but all offshore platforms that are included in the Bureau of Ocean Energy Management’s Technical Information Management System database (“Database”) as the proxy for population. As a result, all such offshore platforms that fall within the Shoreside Partition, not just “drilling platforms,” would be used as the proxy for population for determining build-out coverage.<sup>3</sup> Verizon Wireless confirms that it did intend to use all of the offshore platforms included in the Database as a proxy for population in the Shoreside Partition and has no objection to the Commission clarifying this point in any Order.

Verizon Wireless notes that no party including API filed objections to the proposed assignments and waiver. Accordingly, given the fast approaching build out deadlines for these licenses<sup>4</sup> and the need for LTE services in the Gulf, the FCC should approve the applications and waiver promptly.

Respectfully submitted,

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Date: February 6, 2013

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<sup>3</sup> *Id.* at 5.

<sup>4</sup> 47 C.F.R. §27.14 (h) (C Block licensees must provide signal coverage and offer service over at least 40 percent of the population by June 2013).